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Attorneys for Respondents

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

UNION OF AMERICAN PHYSICIANS &  
 DENTISTS,

Petitioner,

v.

CALIFORNIA DEPARTMENT OF  
 CORRECTIONS, JEANNE WOODFORD,  
 RENEE KANAN, M.D. et al.,

Respondents.

Case No. CV05-3630-~~EMC~~ MMC  
 ORDER APPROVING REQUEST FOR  
**WITHDRAWAL OF COUNSEL AND  
 SUBSTITUTION OF NEW COUNSEL**

[N.D. Cal. Local Rule 11-5]

Date:  
 Time:  
 Judge:

Hon. Edward M. Chen

**WITHDRAWAL OF COUNSEL AND  
 SUBSTITUTION OF NEW COUNSEL**

Pursuant to Northern District Local Rule 11-5, the Department of Personnel Administration (“DPA”), the attorneys of record for the California Department of Corrections, Jeanne Woodford, Renee Kanan, M.D., et al., files this request for substitution of counsel. In support of this request, DPA shows the court the following:

1. This matter was originally filed in the Sacramento County Superior Court on April 26, 2005. Respondents removed the matter to the U.S. District Court Eastern District on May 31, 2005. Respondents’ motion to transfer to the Northern District was ordered on September 6, 2005. A case management conference is scheduled for January 11, 2006.

1           2.       The attorney to be substituted is Jerrold C. Schaefer, Bar No. 39374 of Hanson  
2 Bridgett Marcus Vlahous & Rudy, LLP located at 333 Market Street, 21st Floor, San Francisco,  
3 California 94105; telephone (415) 777-3200.

4           3.       This substitution of counsel has been approved by California Department of  
5 Corrections, Jeanne Woodford, Renee Kanan, M.D., et al., the Respondents in this cause of action.

6           4.       This substitution of counsel is made in the interest of furthering litigation efficiency  
7 by coordinating the defense of this case with a related case, *Plata v. Schwarzenegger, et. al.* (Case  
8 No. C-01-1351 T.E.H.), through the use of the same counsel and/or law firm.

9           5.       This substitution of counsel is not made for reasons of delay, and will not unduly  
10 prejudice the opposing party.

11           Wherefore, the DPA, respectfully requests that the court order this substitution of trial  
12 counsel, and substitute Jerrold C. Schaefer of Hanson Bridgett Marcus Vlahous & Rudy, LLP as the  
13 attorney of record for California Department of Corrections, Jeanne Woodford, Renee Kanan, M.D.,  
14 et al., the Respondents.

15 Dated: October 25, 2005.

16  
17                               Respectfully submitted,

18                               K. WILLIAM CURTIS  
19                               Chief Counsel

20                               WARREN C. STRACENER  
21                               Deputy Chief Counsel

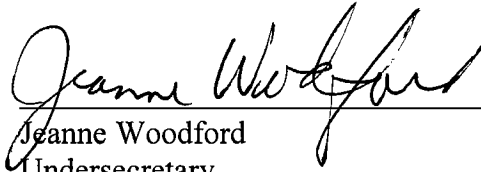
22                               By:

23                               Jennifer M. Garten  
24                               JENNIFER M. GARTEN  
25                               Legal Counsel  
26                               Attorneys for Respondents  
27  
28

**CONSENT OF CLIENT TO SUBSTITUTION OF COUNSEL**

We, California Department of Corrections, Jeanne Woodford, Renee Kanan, M.D., et al., the Respondents in the above-referenced action, consent to the substitution of Jerrold C. Schaefer of Hanson Bridgett Marcus Vlahous & Rudy, LLP as our attorney of record in this cause.

Date: 10-24-05

  
\_\_\_\_\_  
Jeanne Woodford  
Undersecretary

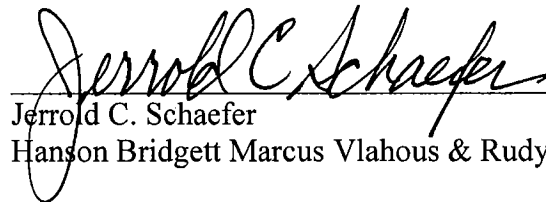
California Department of Corrections and  
Rehabilitation

Date: 10/24/05

  
\_\_\_\_\_  
Renee Kanan, MD

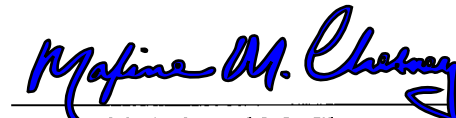
Deputy Director  
Health Care Services Division  
California Department of Corrections and  
Rehabilitation

Date: 10/26/05

  
\_\_\_\_\_  
Jerrold C. Schaefer  
Hanson Bridgett Marcus Vlahous & Rudy, LLP

**IT IS SO ORDERED**

Dated: November 1, 2005

  
\_\_\_\_\_  
~~Honorable Edward M. Chen~~ Maxine M. Chesney  
United States ~~Magistrate~~ Judge  
District